

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION

UNITED STATES OF AMERICA	:	Case No. 1:18-CR-0043
	:	
v.	:	Judge Timothy S. Black
	:	
YANJUN XU	:	<b>STIPULATION</b>
(a/k/a Xu Yanjun and Qu Hui)	:	
	:	

The United States of America, by and through its undersigned attorneys, and the Defendant Yanjun Xu, by and through his undersigned attorneys, submit these agreed-upon stipulations regarding certain exhibits and evidence anticipated to be presented at trial.

- A. The parties stipulate that the Southern District of Ohio is the proper venue and jurisdiction for the offenses charged in the Indictment.
- B. The parties stipulate and agree that the subscriber information contained in the following exhibits are properly authenticated – that is, they are true and accurate copies of the documents they purport to be within the meaning of Rules 901 and 902 of the Federal Rules of Evidence:

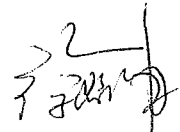
- a. Exhibit 9c
- b. Exhibit 13
- c. Exhibit 16
- d. Exhibit 17
- e. Exhibit 19
- f. Exhibit 20
- g. Exhibit 35
- h. Exhibit 46b
- i. Exhibit 85, pages 9-15.

The Defendant does not stipulate to the authenticity or admissibility of the content of messages produced by the service providers for the accounts identified in each of the above exhibits.

- C. The parties stipulate to the authenticity and admissibility of Exhibits 11(a-h) and 111. The parties also stipulate that the English translations included in Exhibits 11(a-h) and 111 are true, accurate, and reliable translations of the original communications in the French and Chinese languages.
- D. The parties stipulate and agree that that the English translations included in the exhibits are true, accurate, and reliable translations of the original communications in the Chinese language.

**SO STIPULATED:**

DATED: 10/19/2021

  
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YANJUN XU

DATED: 10/19/2021

/s/ Ralph W. Kohnen  
RALPH W. KOHNEN  
JEANNE M. CORS  
ROBERT K. McBRIDE  
SANNA-RAE TAYLOR  
*Counsel for Defendant*

DATED: 10/19/2021

s/ Timothy S. Mangan  
TIMOTHY S. MANGAN  
EMILY N. GLATFELTER  
Assistant United States Attorneys

MATTHEW J. MCKENZIE  
Trial Attorney  
U.S. Department of Justice